

Lowenstein Sandler LLP

Douglas S. Eakeley
Of Counsel

65 Livingston Avenue
Roseland, NJ 07068
T 973 597 2348
F 973 597 2349
deakeley@lowenstein.com

May 4, 2016

VIA ECF

Honorable Cathy L. Waldor, U.S.M.J.
United States District Court for the District of New Jersey
Martin Luther King Jr. Federal Building & Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: In re Lamictal Direct Purchaser Antitrust Litigation, Civ. No. 12-995
In re Lamictal Indirect Purchaser & Antitrust Consumer Litig., Civ. No. 12-5120

Dear Judge Waldor:

With co-counsel Pepper Hamilton LLP, this firm represents Defendant GlaxoSmithKline LLC (“GSK”) in *In re Lamictal Direct Purchaser Antitrust Litigation*, Civ. No. 12-995 (the “Direct Purchaser Action”), and *In re Lamictal Indirect Purchaser & Antitrust Consumer Litig.*, Civ. No. 12-5120 (the “Indirect Purchaser Action”). We write on behalf of GSK and defendants Teva Pharmaceuticals USA, Inc. and Teva Pharmaceutical Industries Ltd.

Pursuant to Your Honor’s Text Order dated May 4, 2016 and entered on the Direct Purchaser Action docket at ECF No. 178, please find attached for endorsement and entry on the dockets of the Direct Purchaser and Indirect Purchaser Actions a version of the ESI protocol that contains Defendants’ proffered provisions and excises the contested provisions submitted by Plaintiffs.

Respectfully submitted,

s/ Douglas S. Eakeley
Douglas S. Eakeley

16212/11
5/4/16 45131387.2

Enclosure

cc: All Counsel of Record (via electronic filing)